

EXHIBIT 203

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE UNITED STATES
VIRGIN ISLANDS,

Plaintiff,

v,
JPMORGAN BANK, N.A.,
No. 22-cv-10904-JSR

Defendant.

JPMORGAN CHASE BANK, N.A.,
Third-Party Plaintiff

•

JAMES EDWARD STALEY,
Third-Party Defendant.

THE ORAL DEPOSITION OF ALBERT BRYAN, JR. was taken on the 6th day of June, 2023, at the Law Offices of Joel Holt, 2132 Company Street, Christiansted, St. Croix, U.S. Virgin Islands, between the hours of 8:42 a.m. and 3:47 p.m. pursuant to Notice and Federal Rules of Civil Procedure.

Reported by:

DESIREE D. HILL
Registered Merit Reporter
Hill's Reporting Services
P.O. Box 307501
St. Thomas, Virgin Islands
(340) 777-6466

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1 running in this election?

2 A. Six.

3 Q. Okay.

4 A. At least I think. Don't quote me. I'm
5 guessing.

6 Q. Was that a normal number or was this a
7 particularly crowded field?

8 A. Lately it's been pretty crowded.

9 Q. And then Epstein reports that you won.

10 And Farkas writes back, Know him?

11 Mr. Epstein writes, Very, Very.

12 You see that?

13 A. Eh-hmm.

14 Q. You have any idea why he was describing
15 your relationship that way other than what we've
16 already discussed?

17 MR. ACKERMAN: Objection

18 speculation.

19 THE WITNESS: No, sir.

20 Q. (By Mr. Neiman:) Do you recall talking to
21 Mrs. de Jongh in or around this time period when you
22 were elected and when you began serving in office
23 about the topic of donations that Mr. Epstein's
24 company might make?

25 A. Yeah.

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1 Q. Take a look at some of those indications.

2 Take a look first at Exhibit 8, which we'll mark as
3 Exhibit 20.

4 MR. ACKERMAN: I got it as 19.

5 MR. NEIMAN: Well, let's make it
6 19, then.

7 (Deposition Exhibit No. 19 was
8 marked for identification.)

9 Q. All right. I'm showing you Exhibit 19
10 which is a short exchange between Mrs. de Jongh and
11 you copied to Richard Kahn. Do you see that?

12 A. Between Mrs. de Jongh and me?

13 Q. No. Between Mrs. de Jongh and Mr. Epstein
14 copied to Richard Kahn.

15 A. Correct. Yeah.

16 Q. So Richard Kahn there, you could see the
17 name spelled out full. Was that someone that
18 contributed to any of your campaigns?

19 A. I don't know Richard Kahn, sir.

20 Q. You don't know one way or the other whether
21 they contributed to your campaigns?

22 A. No, I don't.

23 Q. And Mrs. de Jongh is saying to Mr. Epstein
24 that she spoke to Albert. That reference to you?

25 A. Right.

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1 Q. And he will let us know where he thinks
2 STC's giving would be most impactful. He said, "Thank
3 You." You see that?

4 A. Yes.

5 Q. Do you recall this discussion with de Jongh
6 about where the giving would be most impactful?

7 A. Yes.

8 Q. How did you go about thinking about where
9 the giving would be most impactful?

10 A. Well, I mean, people -- normally
11 non-profits usually contact government, like I said.
12 But I mean, when you're running an election, you
13 speak to everybody. I mean, it's only 11,000 votes,
14 you could shake 11,000 hands. But I have -- the
15 autism project is very near and dear to me. Of
16 course Junior Achievement. I know places that were
17 hit hard.

18 You know, one of my things, Little
19 League. I always thought -- you know, when I played
20 Little League, we always had uniforms and really -- I
21 mean, looked professional. And you know, the kids
22 play in t-shirts now. I mean, I just think they just
23 get a better feeling when they go out there.

24 Q. Okay. And Junior Achievement was the place
25 you had worked before you became governor?

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1 A. Yes.

2 Q. And so one of the things that you did when
3 Mrs. de Jongh asked you, you know, where STC's giving
4 would be most impactful, you said junior achievement?

5 A. Yes.

6 Q. You believed in the organization?

7 A. Yeah. I worked for \$40,000 a year. You
8 know, I didn't do it for the money. I did it
9 because, you know, I really believed that kids need
10 financial literacy.

11 Q. So, that was one of the things that you
12 recommended?

13 A. Yes.

14 Q. So Mrs. de Jongh knew that was an issue
15 that is personally important to you?

16 A. I'm am sure she did. She knows I was
17 essentially volunteering to be there.

18 Q. So by giving to Junior Achievement,
19 Mr. Epstein would be making contribution, then, would
20 not only help the island but would be something that
21 would be appreciated by you personally, right?

22 MR. ACKERMAN: Objection to form.

23 THE WITNESS: All contributions to
24 our charities are appreciated by me
25 personally.

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1 Q. (By Ms. Neiman:) But this is a charity
2 that you particularly invested in, right?

3 A. If you're asking if it bought favor
4 because he invested in Junior Achievement? Not
5 particularly.

6 Q. I didn't ask you that. I asked you --

7 A. I felt like I was helping them out more
8 than they were helping me out.

9 Q. Sure. But you were helping them out by
10 suggesting that they contribute to a charity that you
11 were quite close to, right?

12 A. Right. I think in the documents I was
13 shown, though, I said it would be self-serving for me
14 to recommend Junior Achievement. So I didn't want to
15 do that, you know. Because, I mean, those are my
16 people.

17 Q. But then you actually suggest Junior
18 Achievement?

19 A. Yeah, but I said it will be self-serving
20 for me to do so.

21 Q. So you suggested that it will be
22 self-serving?

23 A. Yeah.

24 Q. And then they decided to give to Junior
25 Achievement, right?

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1 A. I don't know.

2 Q. Fair enough. All right. Let's take a look
3 at -- well, this time I'm showing you Exhibit 20.
4 This is another email exchange to Mrs. de Jongh and
5 Epstein in December of 2018. Between the time when
6 you were elected and began to serve as Governor,
7 correct?

8 (Deposition Exhibit No. 20 was
9 marked for identification.)

10 A. Eh-hmm.

11 Q. It's a tough one for the court reporter.

12 A. Yes.

13 MR. ACKERMAN: Objection to form.
14 The last question, I think there were
15 two questions in there.

16 MR. NEIMAN: Okay.

17 Q. (By Mr. Neiman:) Now, if you look at the
18 bottom of the page, you could see that Mrs. de Jongh
19 writes, Good afternoon Jeffrey, Albert suggested a
20 school for autistic children and Junior Achievement.

21 Do you see that?

22 A. Yes.

23 Q. Autism is another issue that's personally
24 important to you?

25 A. Yes.

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1 on each islands, three balls, three inaugurations,
2 three church services.

3 Q. So that adds up.

4 A. Yes, it does.

5 Q. So your campaign went out solicited
6 donations from people? Yes?

7 A. Yes.

8 Q. And one of the people that you raised money
9 from was Mr. Epstein, correct?

10 A. Not to my knowledge.

11 Q. All right. Let's take a look. This is
12 document marked as Exhibit 23. You see this is an
13 email on December 20th from Mrs. de Jongh to Mr.
14 Epstein. The subject is Inaugural Committee. You see
15 that?

16 (Deposition Exhibit No. 23 was
17 marked for identification.)

18 A. Correct.

19 Q. And Ms. De Jongh is reporting she got a
20 call from Bryan/Roach inaugural committee, and they
21 asked for a \$25,000 donation to the inaugural event?
22 You see that?

23 A. You asked me if my campaign raised any
24 money. This is not my campaign. This is the
25 inaugural committee.

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1 Q. Will you agree that you described your
2 campaign as going out and raising money for your
3 inauguration?

4 A. No, I just want -- when I'm reading this,
5 I'm just saying what this document says.

6 Q. When you talked before, was there also fund
7 raising going on by your campaign for the
8 inauguration?

9 A. The inaugural committee.

10 Q. Not the campaign?

11 A. I'm not sure. I mean, remember this is
12 the island. Like, this is the same people. So I
13 can't say they were in the capacity of the campaign
14 or -- we don't have any recorded -- I don't think we
15 recorded any donations to the election roll for the
16 inaugural committee from the campaigns. So if the
17 inaugural committee was raising money, they were
18 doing it under that guise -- not the campaign was
19 done.

20 Q. Same people, different entity doing the
21 raising.

22 A. Sort of the same people. We had a lot
23 more people in the inaugural committee.

24 Q. Sure. Once you won, everybody wants to be
25 a part of --

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1 MR. ACKERMAN: Objection.

2 THE WITNESS: Absolutely.

3 Q. (By Mr. Neiman:) And what it says here
4 about how you were trying to raise the money privately
5 for inaugural events, that's inaccurate?

6 MR. ACKERMAN: Objection to form.

7 THE WITNESS: Yeah. I wasn't
8 trying to raise any money. The
9 inaugural committee was.

10 Q. (By Mr. Neiman:) Well, did you tell them
11 don't do this?

12 MR. ACKERMAN: Objection to form.

13 THE WITNESS: No.

14 Q. (By Mr. Neiman:) You could have told them
15 not to do it, right?

16 MR. ACKERMAN: Objection to form.

17 THE WITNESS: Yeah, I could have
18 told them not to do it. I think the
19 whole inaugural activity thing is a
20 waste of money anyway. So I didn't
21 really have any involvement in it.

22 Q. (By Mr. Neiman:) Well, you went to the
23 events?

24 A. I didn't have a choice.

25 Q. I mean, you could have told them I don't

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1 want to raise money for this, right?

2 MR. ACKERMAN: Objection.

3 THE WITNESS: I didn't raise any
4 money for it.

5 Q. (By Mr. Neiman:) There was no -- the
6 inaugural committee didn't raise any money?

7 A. I didn't raise any money for it.

8 MR. ACKERMAN: Objection to form.

9 Q. (By Mr. Neiman:) You could have told them
10 you didn't want them to raise any monies for these
11 events, right?

12 A. I guess.

13 Q. But you didn't?

14 A. No, I didn't do that.

15 Q. They understood this is something that you
16 wanted them to do.

17 A. No, no, no.

18 MR. ACKERMAN: Objection to form.

19 THE WITNESS: They understood that
20 this was something traditional that they
21 do. I mean, we just had another one. I
22 didn't think that we should have done
23 that either but I respect the wishes of
24 the people and what comes with the
25 office.

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1 Q. (By Mr. Neiman:) Okay. You certainly
2 didn't do anything to discourage the inaugural
3 committee from raising money, did you?

4 MR. ACKERMAN: Objection to form.

5 THE WITNESS: No.

6 Q. (By Mr. Neiman:) And here they're asking
7 for Mr. Epstein to make a contribution. Do you know
8 whether he did or not?

9 A. No, I don't.

10 Q. What kind of records were kept of who had
11 contributed to the inaugural committee?

12 MR. ACKERMAN: Objection to form.

13 Foundation.

14 THE WITNESS: I don't know.

15 Q. (By Mr. Neiman:) No idea one way or the
16 other?

17 A. No. I mean, you have to remember we had a
18 runoff election. So by the time I realized that I
19 was going to be governor was almost December. We
20 didn't have -- we were taking over the government on,
21 like, January 7th. We had people to vet for cabinet
22 membership. And, you know, my focus at this time was
23 not party. So it was trying to make sure that I was
24 prepared to take over the government.

25 Q. Sure. And one of the things you had to do